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Attorneys for the Plaintiffs and Proposed  
Settlement Class

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**PATRICIA CONNOR, AND  
SHERI L. BYWATER,  
INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS  
SIMILARLY SITUATED**

**PLAINTIFFS,**

**V.**

**JPMORGAN CHASE BANK  
AND FEDERAL NATIONAL  
MORTGAGE ASSOCIATION A/  
K/A FANNIE MAE,**

**Case No: 10-CV-1284 GPC (BGS)**

**CLASS ACTION**

**DECLARATION OF ABBAS  
KAZEROUNIAN IN SUPPORT  
OF MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

**DATE: DECEMBER 4, 2014**

**TIME: 1:30 P.M.**

**THE HON. GONZALO P. CURIEL**

**I, ABBAS KAZEROUNIAN declare:**

1. I am one of the attorneys for the Plaintiff in this action and named as Class Counsel for the Settlement Class in the Court's March 12, 2012 Order preliminarily approving the settlement. I submit this declaration in support of the Joint Motion for Final Approval of the Class Action Settlement.
2. I am licensed to practice law before this court and all California state courts and all federal courts located in the State of California, Texas and Illinois. If called as a witness, I would competently testify to the matters herein from personal knowledge.
3. I am a partner of the law firm of Kazerouni Law Group, APC and a counsel of record for Plaintiffs in this matter, appointed as Class Counsel in the Court's Preliminary Approval Order. I am admitted to this Court and am a member of the State Bar of California in good standing.

**SUMMARY OF CASE HISTORY AND SETTLEMENT**

4. I have been involved in every aspect of this case from inception through the present. I submit this declaration in support of the Plaintiffs' Joint Motion for Final Approval of Class Action Settlement.
5. Co-counsel Douglas J. Campion and Joshua B. Swigart have detailed the case history in their respective declarations. For brevity, I will not repeat those details.

**ADEQUACY OF SETTLEMENT**

6. This is a statutory damages case. No Class member has lost any money as a result of the Defendants' actions, other than their carrier's billing them for the cost of Defendants' calls. Therefore, the deterrent effect of statutory damages has been met, and the proceeds will be divided among the persons called. In other words, the Class members are not getting a percentage of money they have expended; they are receiving money as statutory damages for cell phone calls made. Therefore, obtaining an \$11,268,058.00 settlement for the Class to

1 divide is an exemplary settlement. As a result, in my opinion, based upon my  
 2 experience in civil litigation and in litigating class actions, and based upon the  
 3 facts of this case, the number of class members, and the other circumstances, I  
 4 believe this settlement is fair and reasonable. Therefore, I believe the  
 5 settlement merits Court approval.

#### 6 CLASS COUNSEL EXPERIENCE

7 7. I have outlined my experience in the Declaration of Abbas Kazerounian in  
 8 Support of Preliminary Approval of Class Action Settlement Agreement to be  
 9 heard at the same time as this motion, and I am not repeating it here, for sake  
 10 of brevity, if the Court is inclined to review my credentials relating to the  
 11 Final Approval issues.

12 8. Therefore, Class Counsel is requesting that the Court grant Final Approval to  
 13 the Settlement.

14  
 15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed on September 29, 2014 at San Diego, California, pursuant to the  
 17 laws of the United States.

18  
 19 By: /s/ Abbas Kazerounian

20 Abbas Kazerounian, Esq.

21 Douglas J. Campion (SBN: 75381)  
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